

UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF WEST VIRGINIA

FILED

JAN 18 2023

U.S. DISTRICT COURT-WVND
MARTINSBURG, WV 25401

UNITED STATES OF AMERICA,

v.

ROBERT F. CROSSON

Defendant.

Criminal No.

3:23 CR6

Violation:

18 U.S.C. § 115(a)(1)(B)

18 U.S.C. § 115(b)(4)

18 U.S.C. § 875(c)

INDICTMENT

The Grand Jury charges that:

COUNT ONE

(Influencing Federal Official by Threat)

On or about February 9, 2022, in Berkeley County, within the Northern District of West Virginia, and elsewhere, defendant **ROBERT CROSSON**, did threaten to assault or murder Joseph Manchin III, United States Senator, with intent to impede, intimidate, and interfere with such senator while engaged in the performance of his official duties, and with intent to retaliate against such senator on account of the performance of his official duties, in violation of Title 18, United States Code, Sections 115(a)(1)(B) and 115(b)(4).

COUNT TWO

(Threat by Interstate Communication)

On or about February 9, 2022, in Berkeley County, within the Northern District of West Virginia, and elsewhere, defendant **ROBERT CROSSON**, knowingly and willfully did transmit in interstate commerce, from the State of New York, to the State of West Virginia, a communication to Senator Joseph Manchin III, and the communication contained a threat to injure Senator Joseph Manchin III, specifically **ROBERT CROSSON**, stated “*a bullet coming to your head soon,*” all in violation of Title 18, United States Code, Section 875(c).

A True Bill,

/s/
Grand Jury Foreperson

/s/
WILLIAM IHLENFELD
United States Attorney

Kimberley D. Crockett
Assistant United States Attorney